IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

CAMBRIA COMPANY LLC

Plaintiff,

v.

LAKESIDE SURFACES, INC.,

Defendant.

Case No. 1:20-cv-508 (JMB/PJG)

Hon. Jane M. Beckering

PLAINTIFF CAMBRIA COMPANY LLC'S MOTION FOR LEAVE TO AMEND ITS COMPLAINT

Plaintiff Cambria Company LLC ("Cambria") hereby moves for leave to amend its Complaint. Cambria recently confirmed at depositions of Defendant Lakeside Surfaces, LLC's ("Lakeside") witnesses additional facts to support allegations of fraud regarding Lakeside's procurement of its trademark. Cambria thus moves to amend its pleading to include allegations of fraud and petition for cancellation of the trademark. Cambria also seeks to remove original counts directed to trademark infringement and Federal and State unfair competition claims.

Cambria's motion is properly granted for the reasons stated in Cambria's brief, filed herewith. A proposed order granting Cambria leave to amend its Complaint is attached hereto as Exhibit A.

Dated: April 13, 2022

s/Gregory A. Lewis
Gregory A. Lewis (P75796)
Matthew J. Gipson (P60169)
PRICE HENEVELD LLP
695 Kenmoor Ave., S.E.
P.O. Box 2567
Grand Rapids, MI 49501
Tel: 616-949-9610
glewis@priceheneveld.com
mgipson@priceheneveld.com

John C. Adkisson FISH & RICHARDSON P.C. 3200 RBC Plaza 60 South 6th Street Minneapolis, MN 55402 Tel: 612-335-5070 adkisson@fr.com

Grayson P. Sundermeir FISH & RICHARDSON P.C. 222 Delaware Avenue, 17th Floor Wilmington, DE 19801 Tel: 302-652-5070 sundermeir@fr.com

Attorneys for Plaintiff Cambria Company LLC

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

CAMBRIA COMPANY LLC	
Plaintiff,	
v. LAKESIDE SURFACES, INC., Defendant.	Case No. 1:20-cv-508 (JMB/PJG) Hon. Jane M. Beckering
<u>ORDER</u>	
This matter came on before the undersigned on Plaintiff Cambria Company LLC's	
("Cambria's") Motion for Leave to Amend its Complaint.	
Upon consideration of the papers filed in support of Cambria's Motion for Leave to	
Amend its Complaint, it is ORDERED that Cambria's Motion for Leave to Amend its	
Complaint is GRANTED .	
IT IS SO ORDERED.	
Dated:, 2022	Honorable Judge Phillip J. Green U.S. District Court Magistrate Judge